

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

**PATSY JAY**

Plaintiff,

**Case No.: 3:23-cv-00656-SI**

**v.**

**GRAND MANAGEMENT SERVICES, INC., et  
al.**

Defendant.

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**Fed. R. Civ. P. 26(a)(1) Discovery Agreement**

Pursuant to LR 26–2, I state that the parties who have been served and who are not in default have agreed to forgo the disclosures required by Fed. R. Civ. P. 26(a)(1).

**DATED:** July 25, 2023

**Signature:** s/ Heidi L. Mandt

**Name and OSB ID:** Heidi L. Mandt, OSB #953459

**E-mail Address:** hmandt@williamskastner.com

**Firm Name:** Williams Kastner

**Mailing Address:** 1515 SW Fifth Avenue, Suite 600

**City, State, Zip:** Portland, OR 97201

**Parties Represented:** Defendants Grand Management Services, Inc., Jerry Mascolo,  
Leondra Coleman and Dawn Cockrum